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November 10, 1996

Mr. Steve Koester
Environmental Specialist
Santa Fe Springs Fire Department
11300 Greenstone Avenue
Santa Fe Springs, CA 90670-4619

Re: Sulfuric Acid Release, November 8, 1996, 3:30 P.M.

1. The Incident

At the end of the shift at 3:30 P.M. on Friday, our Environmental Specialist & Q.A. Director Domingo Garcia carried-out routine inspection of the chemical storage area.

An employee of Unocal, a business adjacent to our property, informed Domingo of a chemical spill from our storage on their parking lot. Domingo advised her that the chemical is a virgin sulfuric acid and asked her to stay away from the area and keep other employees from this hazardous material spill.

Our investigation determined that the release was caused by a broken quick disconnect on a transfer pump. We have estimated that of the 40 gallons released, approximately half the volume was spilled on the Unocal parking lot.

2. Emergency Response

We have assembled a team of employees trained at First Responder Operational Level. Domingo Garcia, George Petrasek and Ken Hergesheimer brought safety and emergency response equipment to the site. Our immediate concern was to prevent the spill from spreading and to prevent exposure of Unocal employees and the response personnel. We have used absorbent and pigs to achieve this step.

Approximately at 5:45 P.M. Battalion Chief Neal Welland arrived with the Fire Department's Environmental Specialist to assess the incident. The authorities reviewed and approved our response plan and gave us go ahead to proceed. The Battalion Chief would inspect the site upon completion.

3. Clean-Up and Decontamination

Response Personnel Duties & Responsibilities

a) Incident Commander: George Petrasek

Coordinated the response with the Fire Department and Unocal employees present on premises.

b) Assistant Commander: Darrell Golnick

Responsible for supplies and equipment.

c) Environmental Specialist: Domingo Garcia

In charge of clean-up and decontamination. Made decisions requiring technical expertise.

d) Clean-Up Crew: Ken Hergersheimer, Jack Pickerd

Project Summary

George presented a brief discussion of the plan and assigned responsibilities. All personnel donned PPE. Darrell Golnick left site to pick up additional equipment including industrial vacuum cleaner and a pressured hot water cleaner.

The equipment arrived around 6:30 P.M. and the clean-up started.

- * Domingo and Ken first scooped the absorbent soaked with acid and placed it in a plastic drum.
- * Domingo neutralized the effected area with sodium bicarbonate and applied a 5% solution of caustic soda.
- * Jack thoroughly washed the effected area with a pressured hot water cleaner.
- * At the same time, Ken was vacuuming the rinse water at the low spot of the hot zone.
- * Domingo checked a pH of a pool of water in several different locations and determined it to be between 9 and 10.
- * All clean-up equipment was decontaminated on site.

- * George called the Battalion Chief Neal Welland for inspection of the site. Mr. Welland arrived around 9:40 P.M. and found the site in satisfactory condition. He requested written report on the incident addresses to the Environmental Specialist, Mr. Steve Koester.

4. Waste Generated

The clean-up generated following quantities of hazardous waste:

Six (6) 55 gallon drums of rinse waste water.

One (1) drum of approximately 150 lbs. of absorbent with sulfuric acid.

5. Hazardous Waste Disposal

All the liquid and solid waste was processed in the batch neutralization treatment unit at Associated Plating Co. The pH of the waste was adjusted to 10-11 range with the liquid caustic soda prior to filtration and discharge of the supernatant effluent.

6. Safety Equipment Used

- | | |
|--------------------------------|-----------------|
| a) Neoprene gloves | g) PVC coverall |
| b) Rubber boots | |
| c) Goggles | |
| d) Half mask respirator | |
| e) Aprons, nitrile, belly band | |
| f) First aid isotoner | |

7. Clean-Up & Decontamination Equipment

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|--------------------------------|---------------------------|
| a) Shovels | n) pH paper, 0-14 range |
| b) Brooms | o) Sodium Bicarbonate |
| c) Squeegees | p) 5% liquid caustic soda |
| d) Industrial vacuum cleaner | |
| e) Pressured hot water cleaner | |
| f) 55 gallon drums | |
| g) 5 gallon buckets | |
| h) Plastic scoops | |
| i) Flood light | |
| j) Funnel | |
| k) Water hose | |
| l) Forklift | |
| m) Pick-up truck | |

8. Preventive Measures/ Corrective Action

- a) Sulfuric acid bulk storage tank will be eliminated. The acid will be purchased in 55 gallon drums and dispensed by a drum pump.
Completion date: Immediately
- b) Rayon grade caustic soda transfer pump will be eliminated. The liquid will be transferred by gravity into a 55 gallon drum for dispensing.
Completion date: November 29, 1996
- c) Transfer pump for the 50% liquid caustic will be mounted at the ground level. The plumbing and the plumbing connections will be double contained.
Completion date: December 13, 1996
- d) The acids and caustic solution in the bulk storage will be separated by 2 hour firewall. Overhead weather protection will be installed.
Completion date: January 30, 1997
- e) NFPA placards will be posted in the bulk storage area.
Completion date: November 29, 1996
- f) Our Emergency Response Plan will be modified with respect to personnel responsible for verbal notification in case of emergency. The modification will be submitted to the Fire Department by November 22, 1996. At this time, following order of responsibility will apply:

Primary notifier: Darrell Golnick
First alternate: George Petrasek
Second alternate: Jack Pickerd
- g) Our Emergency Response Team will retrain and drill twice a year. Next training will be accomplished by end of December.

Prepared by: Domingo Garcia


QA Director & Environmental Specialist

Approved by: George Petrasek


General Manager

cc: Darrel Golnick, President, Associated Plating
Jack Pickerd, Maintenance Supervisor, Associated Plating
Richard Salisbury, Manager, Unocal Corp.